

Message

From: Soliman, Hesham M [Hesham.Soliman@lyondellbasell.com]
Sent: 1/21/2020 6:04:59 PM
To: Barranco, Wade T [Wade.Barranco@lyondellbasell.com]
Subject: FW: Your Comment Submitted on Regulations.gov (ID: EPA-HQ-OPPT-2019-0236-0001)

FYI

*Regards,
Hesham Soliman*

Senior Product Steward – Global Chemical Control
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From: Soliman, Hesham M
Sent: Tuesday, January 21, 2020 11:59 AM
To: no-reply@regulations.gov
Subject: RE: Your Comment Submitted on Regulations.gov (ID: EPA-HQ-OPPT-2019-0236-0001)

FYI

*Regards,
Hesham Soliman*

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From: no-reply@regulations.gov <no-reply@regulations.gov>
Sent: Tuesday, January 21, 2020 11:58 AM
To: Soliman, Hesham M <Hesham.Soliman@lyondellbasell.com>
Subject: Your Comment Submitted on Regulations.gov (ID: EPA-HQ-OPPT-2019-0236-0001)

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Agency: Environmental Protection Agency (EPA)

Document Type: Nonrulemaking

Title: Meetings: N-Methylpyrrolidone; Draft Toxic Substances Control Act (TSCA) Risk Evaluation and TSCA Science Advisory Committee on Chemicals

Document ID: EPA-HQ-OPPT-2019-0236-0001

Comment:

*THIS COMMENT IS SUBMITTED TO SUBSTITUTE FOR AN EARLIER COMMENT (Comment Tracking Number: 1k4-9ekh-rhn6). THE PURPOSE FOR RESUBMISSION IS TO CORRECT DATE OF SUBMISSION ON COVER LETTER.

January 21, 2020

Submitted to Docket

Document Control Office (7407M)

Office of Pollution Prevention and Toxics (OPPT)

U.S. Environmental Protection Agency

1200 Pennsylvania Avenue, NW

Washington, DC 20460-0001

Re:Report Evaluating Reproductive and Developmental Toxicity Data on N-Methylpyrrolidone (EPA-HQ-OPPT-2019-0236)

To Whom It May Concern:

Appended for the U.S. Environmental Protection Agency's (EPA) consideration is a critical review and evaluation of the reproductive toxicity data for N-Methyl-2-Pyrrolidone (NMP). This report was prepared by Willem Faber, Ph.D., D.A.B.T., a recognized expert in reproductive toxicity (CV appended), at the request of LyondellBasell Industries. Reproductive toxicology reports reviewed were provided by the NMP Producers Group, under the condition that disclosure of these documents to 3rd parties is prohibited.

As outlined in Dr. Faber's report, EPA's conclusions on the reproductive and developmental toxicity potential of NMP in its draft risk evaluation are flawed due to: 1) the lack of inclusion of the information from the two-generation reproductive studies conducted with NMP at Huntingdon (1999) and BASF (1999) and 2) failure to identify the reproductive problems within the source population of rats used within the Exxon (1991) study.

We urge EPA to correct these data issues in the final NMP risk evaluation.

Thank you for the opportunity to submit this report to the docket. Should you have any questions or require additional details, please do not hesitate to contact us at our chemical control service desk E-mail:

global.chem.control@lyondellbasell.com

Regards,

Hesham M Soliman

Senior Product Steward - Global Chemical Control

LyondellBasell Corporate HSE - Product Safety

Lyondell Chemical Company, 1221 McKinney Street, Suite 300, Houston, TX 77010

Uploaded File(s):

- Faber Evaluation_Fertility, Fecundity_ NMP.pdf
- FABER CV 2019.pdf

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